

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

**UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL AND TO EXTEND
TIME LIMIT UNDER LOCAL RULE CV-5(a)(7)(E)**

Plaintiff States respectfully move the Court for leave to file under seal Plaintiff States' Response to Google LLC's Motion for Summary Judgment on Plaintiffs' Antitrust Claims. Plaintiff States will file this document today. Defendant Google LLC ("Google") does not oppose this motion.

Because Plaintiff States' filing is voluminous and contains information subject to Google's claims of confidentiality pursuant to the Confidentiality Order, Dkt. 182, Plaintiff States seek permission to file under seal in the first instance and to extend the time limit under Local Rule CV-5(a)(7)(E) for Google to submit redacted versions from seven to 21 days.

Google sought to file its Motions for Summary Judgment, Motion to Exclude, and accompanying documents under seal in the first instance, and sought to extend the time limit for filing redacted versions of these documents from seven to 21 days. Dkts. 665, 666, 670. The Court granted that relief, Dkt. 685, and should implement the same process with respect to Plaintiff States' responsive filings. *See Carranza v. Shelton & Valadez, P.C.*, No. SA-22-CV-00025-ESC, 2023 WL 3260544, at *1 (W.D. Tex. May 4, 2023) (discussing court's inherent power to manage its docket).

The Court should therefore grant Plaintiff States' unopposed motion to seal the above document and to extend the limit for filing a redacted version under Local Rule CV-5(a)(7)(E) from seven to 21 days.

DATED: December 9, 2024

Respectfully submitted,

/s/ W. Mark Lanier

W. Mark Lanier

Mark.Lanier@LanierLawFirm.com

Alex J. Brown

Alex.Brown@LanierLawFirm.com

Zeke DeRose III

Zeke.Derose@LanierLawFirm.com

Jonathan P. Wilkerson

Jonathan.Wilkerson@LanierLawFirm.com

10940 W. Sam Houston Pkwy N.

Suite 100

Houston, TX 77064

(713) 659-5200

/s/ Ashley Keller

Ashley Keller

ack@kellerpostman.com

Kiran N. Bhat

kiran.bhat@kellerpostman.com

2333 Ponce De Leon Boulevard

Suite R-240

Coral Gables, Florida 33134

(833) 633-0118

Zina Bash (Bar No. 24067505)

zina.bash@kellerpostman.com

111 Congress Avenue, Suite 500

Austin, TX 78701

(512) 690-0990

THE LANIER LAW FIRM, PLLC

Counsel for Texas, Idaho, Louisiana (The Lanier Law Firm only), Indiana, Mississippi, North Dakota, South Carolina, and South Dakota

Submitted on behalf of all Plaintiff States

/s/ Noah S. Heinz

Noah S. Heinz

noah.heinz@kellerpostman.com

1101 Connecticut Ave., N.W., Suite 1100

Washington, DC 20036

(202) 918-1123

KELLER POSTMAN LLC

NORTON ROSE FULBRIGHT US LLP

Joseph M. Graham, Jr.

joseph.graham@nortonrosefulbright.com

Geraldine Young

geraldine.young@nortonrosefulbright.com

1550 Lamar Street, Suite 2000

Houston, Texas 77010

(713) 651-5151

Marc B. Collier

Marc.Collier@nortonrosefulbright.com

98 San Jacinto Blvd., Suite 1100

Austin, Texas 78701

(512) 474-5201

FOR PLAINTIFF STATE OF TEXAS

KEN PAXTON
Attorney General

/s/ James R. Lloyd

Brent Webster, First Assistant Attorney General of Texas

Brent.Webster@oag.texas.gov

James R. Lloyd, Deputy Attorney General for Civil Litigation

James.Lloyd@oag.texas.gov

STATE OF TEXAS, OFFICE OF THE ATTORNEY GENERAL

P.O. Box 12548

Austin, TX 78711-2548

(512) 936-1674

Attorneys for Plaintiff State of Texas

CERTIFICATION OF CONFERENCE

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that Google LLC does not oppose the foregoing sealing request.

/s/Kiran N. Bhat

Kiran N. Bhat

CERTIFICATE OF SERVICE

I certify that on December 9, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Kiran N. Bhat

Kiran N. Bhat